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11 Attorneys for Plaintiff
12 United States of America
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14 IN THE UNITED STATES DISTRICT COURT
15
16 EASTERN DISTRICT OF CALIFORNIA

17 UNITED STATES OF AMERICA,
18 Plaintiff,
19 v.
20 JOSE GUADALUPE LOPEZ-ZAMORA,
21 LEONARDO FLORES BELTRAN,
22 CHRISTIAN ANTHONY ROMERO,
23 JOAQUIN ALBERTO SOTELO VALDEZ,
24 ERIKA GABRIELA ZAMORA ROJO,
25 JOSE LUIS AGUILAR SAUCEDO, and
26 ROSARIO ZAMORA ROJO,
27 Defendants.

28
1 CASE NO. 2:21-CR-0007-DAD
2 STIPULATION REGARDING EXCLUDABLE
3 TIME PERIODS UNDER SPEEDY TRIAL ACT;
4 [PROPOSED] ORDER
5
6 DATE: September 22, 2022
7 TIME: 9:30 a.m.
8 COURT: Hon. Dale A. Drozd

9
10 STIPULATION

11 Plaintiff United States of America, by and through its counsel of record, and the above-captioned
12 defendants, by and through their respective counsel of record, hereby stipulate as follows:

13 1. By previous order, this matter was set for status on September 22, 2022.

14 2. By this stipulation, defendants now move to continue the status conference until

15 September 22, 2022, and to exclude time between September 22, 2022, and December 13, 2022, under
16 Local Codes T2 and T4.

17 3. The parties agree and stipulate, and request that the Court find the following:

1 a) The grand jury returned an indictment in this case on January 28, 2021. Fourteen
2 defendants are named in the publicly filed indictment. The names of two additional defendants
3 who have not yet been arrested are redacted from the publicly filed indictment.

4 b) On May 11, 2021, the Court signed an order substituting attorney Kresta Daly as
5 counsel of record for defendant Christian Romero. ECF No. 162.

6 c) On January 4, 2022, defendant Rosario Zamora Rojo made his initial appearance
7 on a criminal complaint. *See* 2:21-MJ-00153-DB, ECF No. 5.

8 d) On March 3, 2022, the grand jury returned a superseding indictment adding
9 Rosario Zamora Rojo as a defendant and adding a money-laundering conspiracy charge against
10 defendants Jose Lopez-Zamora and Erika Zamora Rojo. ECF No. 276.

11 e) The government has represented that the discovery associated with this case to
12 date includes approximately 7,720 pages of materials, including investigative reports,
13 photographs, search warrant materials, and other documents, as well as voluminous audio and
14 video recordings and approximately 978 recorded phone calls intercepted pursuant to the Title III
15 wiretap in this case. All of this discovery has been either produced directly to counsel and/or
16 made available for inspection and copying.

17 f) Counsel for defendants need additional time to review the voluminous discovery
18 in this case, to conduct independent factual investigation, to research trial and sentencing issues,
19 to consult with their clients, and to otherwise prepare for trial.

20 g) Counsel for defendants believe that failure to grant the above-requested
21 continuance would deny them the reasonable time necessary for effective preparation, taking into
22 account the exercise of due diligence.

23 h) The government does not object to the continuance.

24 i) In addition, this case is “complex” within the meaning of 18 U.S.C.
25 § 3161(h)(7)(A), B(ii) [Local Code T2], as this Court previously found in its February 10, 2021
26 Order (ECF No. 103) and subsequent orders.

j) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

k) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of September 22, 2022 to December 13, 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] and 18 U.S.C. § 3161(h)(7)(A), B(ii) [Local Code T2] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: September 14, 2022

PHILLIP A. TALBERT
United States Attorney

Dated: September 14, 2022

/s/ Todd D. Leras
Todd D. Leras
Counsel for Defendant
JOSE GUADALUPE LOPEZ-
ZAMORA

Dated: September 14, 2022

/s/ Christopher R. Cosca
Christopher R. Cosca
Counsel for Defendant
LEONARDO FLORES BELTRA

Dated: September 14, 2022

/s/ Kresta N. Daly
Kresta N. Daly
Counsel for Defendant
CHRISTIAN ANTHONY ROMERO

1 Dated: September 14, 2022

/s/ Michael D. Long

2 Michael D. Long
3 Counsel for Defendant
4 JOAQUIN ALBERTO SOTELO
5 VALDEZ

6 Dated: September 14, 2022

/s/ Martin Tejeda

7 Martin Tejeda
8 Counsel for Defendant
9 ERIKA GABRIELA ZAMORA ROJO

10 Dated: September 14, 2022

/s/ Dina L. Santos

11 Dina L. Santos
12 Counsel for Defendant
13 JOSE LUIS AGUILAR SAUCEDO

14 Dated: September 14, 2022

/s/ Shari Rusk

15 Shari Rusk
16 Counsel for Defendant
17 ROSARIO ZAMORA ROJO

18 **[PROPOSED] FINDINGS AND ORDER**

19 IT IS SO FOUND AND ORDERED this ____ day of _____, ____.

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28 THE HONORABLE DALE A. DROZD
STIPULATION REGARDING EXCLUDABLE TIME
PERIODS UNDER SPEEDY TRIAL ACT